EXHIBIT 5

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

FACEBOOK, INC., and MARK ZUCKERBERG,

Plaintiff,

vs.

Case No. 5:07-CV-01389-RS

CONNECTU, INC., (formerly known as CONNECTU, LLC), CAMERON WINKLEVOSS, TYLER WINKLEVOSS, DIVYA NARENDRA, PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, WAYNE CHANG, and DAVID GUCWA and DOES 1-25,

Defendants.

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***** HIGHLY CONFIDENTIAL *****

VIDEOTAPED DEPOSITION OF WINSTON WILLIAMS

Tuesday, June 19, 2007

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SHEILA CHASE & ASSOCIATES
REPORTING FOR:
LiveNote World Service
221 Main Street, Suite 1250
San Francisco, California 94105
Phone: (415) 321-2300
Fax: (415) 321-2301

Reported by:
RACHEL FERRIER, CSR
CSR No. 6948

Q Yes.
A Yes.
Q All right. What company?
A I worked doing contract programming work for various large number of companies. I can't list them all off the top of my head.
Q When did you set up -- or was this all contract work?
A Yes.
Q All right. So you were not employees of any of these companies?
A No.
Q All right. How long did you work for Pacific Northwest Software?
A Several years.
Q All right. When did you cease to work for Pacific Northwest Software?
A I don't know the date.
Q Was it in 2006?
A I believe so.
Q Okay. Did you ever work as an employee of ConnectU?
A No.
Q All right. Did you ever work as an employee of any company owned or bearing the named

Q Who were the other people?
A I know at one point Joel Voss had access. I know that John Taves had access. And I may have this name incorrect, but I think it's Alex Nakovika (phonetic), or something. And another Russian with a name that starts with "A." I think it was Andrew something.
Q Okay.
A He had access. David Gucwa had access to the server. I'm not sure who had administrative right or whatnot, but there was, you know, various people who had access at different points.
Q All right. Do you have a rough estimate when the last time was that you had access to the active code?
A Last time that I had access to the active code --
Q Or executable.
A On which server?
Q On the World Link server.
A I believe it's been over a year.
Q Okay. And you initially had a copy on your own Vaio?
A Yes.
Q All right. When was the last time you had

Q Do you know who the lawyers are you are referring to there?
A I'm not sure.
Q Do you recall the discussion that's referenced here?
MR. MOSKO: Calls for a "yes" or "no" answer.
THE WITNESS: No.
BY MR. COOPER:
Q All right. Do you have an understanding here today if there is a methodology to identify the number of e-mails that were sent by ConnectU to students at California schools?
MR. MOSKO: Lacks foundation.
THE WITNESS: Could you repeat?
BY MR. COOPER:
Q Is there any function that would permit somebody reconstructing events to know how many e-mails were sent by ConnectU to students at California schools?
MR. MOSKO: Lacks foundation.
THE WITNESS: It would be complicated to do something of that nature, and I don't know that it has been done or is an existing function. It's maybe possible, yeah. I mean, I'm sure it's possible in

some, yes.
BY MR. COOPER:
Q Is there anywhere that the sending of e-mails by ConnectU is logged -- or was logged in this ConnectU system?
A Yes.
Q All right. Where was that logged?
A On the database server at PNW Soft data center.
Q All right. So all e-mails that would have been sent in the period of time that the ConnectU code was hosted by PNS server would be logged?
A At some point they were logged. Not necessarily permanently, but they were logged, yes.
Q All right. Now, notwithstanding the entry on page 5, you have no independent recollection of actually trying to generate the information?
A I don't have any recollection of doing that, no.
Q Okay. How -- you say it might be difficult to reconstruct that information.
Do you have a sense how difficult?
A Yeah. I mean, I believe you need to first determine every school that's in California and then determine every e-mail address domain extension for

every school in California, and then you would need to determine every possible, like, iteration of that e-mail domain extension, and then you would have to have some way of filtering through the database and scanning through all of the e-mail addresses and applying to which ones actually were related to the students at California schools.

Q Okay.

A I think it would take some number of hours.

Q But it would be able to identify at least the California universities by edu address; correct?

MR. MOSKO: Lacks foundation.

THE WITNESS: If you were able to actually know for certain that you had an entire list of California school and edu addresses.

MR. COOPER: It's exactly noon. We have been going a little over an hour and 15 minutes. I'm happy to take a quick break. I'm going to give you two the option. I'm more than happy to take a break for lunch or to just finish up the -- go through --

THE WITNESS: I wouldn't mind taking at least a restroom break.

THE VIDEOGRAPHER: Going off the record, now at 12:02.

(Recess taken.)

THE VIDEOGRAPHER: Okay. We are back on the record now at 12:14.

BY MR. COOPER:

Q Mr. Williams, before we broke, we were talking about the ability to identify what e-mails had been sent to California students.

Do you recall that?

A Yes.

Q Is there any way to equally determine the extent e-mail accounts were obtained from the Facebook Website and imported to ConnectU which ones came from California schools?

MR. MOSKO: Can I have that question reread, please.

(Record read by the Reporter as follows:
"QUESTION: Is there any way to actually determine the extent e-mail accounts were obtained from the Facebook Website and imported to ConnectU which ones came from California schools?")

THE WITNESS: There may be some way.

BY MR. COOPER:

Q All right. Was a database set up to relate Facebook accounts in the ConnectU database field?

A I don't know if your wording is correct,